

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

GREGORY CRAWFORD,

Plaintiff,

VS.

CONESTOGA-ROVERS & ASSOCIATES,
INC.

Defendant.

CIVIL ACTION NO. 3:13-cv-00393-P
(COURT UNIT OF JUDGE SOLIS)

**DEFENDANT CONESTOGA-ROVERS & ASSOCIATES'
RULE 68 OFFER OF JUDGMENT**

DEFENDANT CONESTOGA-ROVERS & ASSOCIATES, INC. ("CRA") submits this Offer of Judgment pursuant to FED.R.CIV.P. 68.

CRA offers to allow entry of judgment pursuant to FED.R.CIV.P. 68 as follows:

1. Judgment in favor of PLAINTIFF GREGORY CRAWFORD and against DEFENDANT CRA in the amount of (a) \$30,000.00, which is inclusive of any amount claimed by Plaintiff on any of his claims together with any amount claimed by Plaintiff as reasonable attorney's fees; and (b) taxable costs of court incurred to the date of this Offer.

2. This offer is made pursuant to the provisions of FED.R.CIV.P. 68 and will be deemed withdrawn unless Plaintiff serves a written notice of acceptance of the offer within 14 days of the date that it was served upon him.

3. If Plaintiff does not accept this offer and the judgment finally obtained by Plaintiff is not more favorable than this offer, CRA prays that Plaintiff pay all litigation costs incurred by CRA, including reasonable attorneys' fees, actual trial expenses, deposition costs, fees for expert witnesses, and such other and further costs and expenses as are contemplated by the applicable provisions of Rule 68 and the statutes upon which Plaintiff's claims are based.

4. CRA makes this offer of judgment in order to avoid the costs of litigation, and this offer should not be construed as any indication of the merits of Plaintiff's claims or of any liability on the part of CRA.

SIGNED this 20th day of September, 2013.

Respectfully submitted,

JACKSON WALKER L.L.P.

Lionel M. Schooler
LIONEL M. SCHOOLER (SBN 17803300)
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ATTORNEYS FOR DEFENDANT CON-
ESTOGA ROVERS & ASSOCIATES, INC.

OF COUNSEL:

JACKSON WALKER L.L.P.

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Dallas, Texas 75202
(214) 953-5858 (Dir.)

CERTIFICATE OF SERVICE

This is to certify that on this 20th day of September, 2013, a true and correct copy of the foregoing Rule 68 Offer of Judgment was served via fax transmission and via certified mail, return receipt requested, upon Counsel for Plaintiff, Ms. Jane Legler Byrne, Esq. (SBN 03565820), Neill & Byrne, PLLC, 2214 Main Street, Dallas, Texas 75201.

Lionel M. Schooler
LIONEL M. SCHOOLER